

# EXHIBIT G

# Allen Matkins

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## Via Overnight Mail

November 4, 2015

Bank of America  
Legal Order Processing  
DE5-024-02-08  
P.O. Box 15047  
Wilmington, Delaware 19850-5047

**Re: *SEC v. Steve Chen, USFIA, Inc. et al.,*  
United States District Court, Central District of California,  
Case No. CV 15-07425 RGK (GJSx)**

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To Whom It May Concern:

My firm represents Thomas Seaman, Court-appointed permanent receiver for USFIA, Inc., Alliance Financial Group, Inc., Amauction, Inc., Aborell Mgmt I, LLC, Aborell Advisors I, LLC, Aborell REIT II, LLC, Ahome Real Estate, LLC, Alliance NGN, Inc., Apollo REIT I, Inc., Apollo REIT II, LLC, Amkey, Inc., US China Consultation Association, and Quail Ranch Golf Club, LLC, and their subsidiaries and affiliates ("Receivership Entities") in the above-referenced action ("SEC Action"). In the SEC Action, the SEC has alleged that Defendants Steve Chen and the Receivership Entities operated a fraudulent investment scheme raising more than \$32 million from numerous investors.

In response to the evidence presented by the SEC, the Court recently issued a Temporary Restraining Order ("TRO") and Preliminary Injunction Order ("PI Order"), which, among other things, freeze the assets of Mr. Chen and the Receivership Entities and appoint Mr. Seaman permanent receiver for the Receivership Entities. Copies of the TRO and PI Order have previously been provided to Bank of America, but are enclosed herewith for ease of reference.

In response to the TRO and PI Order, and pursuant to the immediate asset freeze provisions of those orders, Bank of America has frozen certain accounts relating to Mr. Chen and the Receivership Entities.

We are in receipt of the letter dated October 28, 2015, from attorney Thomas Zaccaro to Bank of America on behalf of Jennifer Zhao and Ally Investors, LLC. In his letter, Mr. Zaccaro

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Bank of America  
November 4, 2015  
Page 2

contains certain accounts under the names David Chen, Li Zhao/Jennifer Zhao, and Ally Investors should be unfrozen.

Contrary to Mr. Zaccaro's contentions, the accounts at issue in his letter are directly related to Mr. Chen and the Receivership Entities and therefore should remain frozen. In particular, the Receiver's investigation to date indicates that (a) Li Zhao (aka Jennifer Zhao) is the mother of Steve Chen's son, David Chen; (b) Ms. Zhao received substantial sums from the Receivership Entities in the form of lavish gifts, payments of travel and other personal expenses, tuition payments, and substantial cash withdrawals; (c) Ms. Zhao was a highly paid employee of Receivership Entity Alliance NGN, Inc.; and (d) Ally Investors received at least \$1,500,000 from Receivership Entity Ahome Real Estate, LLC between February 2012 and February 2015.

The Receiver's investigation also indicates Ally Investors was not doing any business or performing any services for the Receivership Entities. The records do not reflect that the transfers to Ally Investors were anything other than simply depositing money into another account similar to the numerous other accounts related to the USFIA enterprise. Ally Investors, therefore, appears to be simply a shell company affiliated with Mr. Chen and the other Receivership Entities.

We have asked Mr. Zaccaro on several occasions to provide information concerning Li Zhao and Ally Investors and he has refused to provide such information or explain why millions of dollars was sent to and used to pay the bills of Zhao and Ally. As a result, we have recently served subpoenas on Li Zhao and Ally Investors, through Mr. Zaccaro.

At this early stage of the case, there is already substantial evidence of the close ties and direct affiliation between Li Zhao and Ally Investors and Steve Chen and the Receivership Entities. Accordingly, the accounts should remain frozen pending further order of the Court.

We appreciate your attention to this matter.

Very truly yours,



Ted Fates

EGF/jlh

cc: Thomas Seaman, Receiver  
David Zaro, Esq.  
Thomas Zaccaro (counsel for Li Zhao and Ally Investors, LLC)  
Donald Searles, Esq., U.S. Securities and Exchange Commission  
Peter del Greco, Esq., U.S. Securities and Exchange Commission